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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 21-CR-00264
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	JANUARY 11, 2022 TO MARCH 8, 2022 AND
v.)	ORDER
)	
BROGDAN VADUVA,)	
)	
Defendant.)	
)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Brogdan Vaduva, that time be excluded under the Speedy Trial Act from January 11, 2022 through March 8, 2022.

The government and counsel for the defendant agree that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. The government has produced over 3,000 pages of discovery and the parties have been in plea negotiations. For this reason, the parties stipulate and agree that excluding time until March 8, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from January 11, 2022 through March 8, 2022 from computation under the Speedy Trial Act outweigh the best interests of

1 the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

2 The undersigned Assistant United States Attorney certifies that she has obtained approval from
3 counsel for the defendant to file this stipulation and proposed order.

4
5 IT IS SO STIPULATED.

6 DATED: January 5, 2022

/s/ Alexis James
ALEXIS JAMES
Assistant United States Attorney

8 DATED: January 5, 2022


/s/ David Beitchman
DAVID BEITCHMAN
Counsel for Defendant Brogdan Vaduva

10
11 **ORDER**

12 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
13 Court finds that failing to exclude the time from January 11, 2022 through March 8, 2022 would
14 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective
15 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The
16 Court further finds that the ends of justice served by excluding the time from January 11, 2022 to March
17 8, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the
18 defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED
19 that the time from January 11, 2022 through March 8, 2022 shall be excluded from computation under
20 the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

21 IT IS SO ORDERED.

22
23 DATED: 1/10/2022


JAMES DONATO
United States District Judge